

## **REMARKS**

This paper is filed in response to the Office Action mailed August 6, 2007.

Claims 1-15 are pending in the present application. Claims 1-3, 5-10, and 12-15 are rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent 6,002,184 to Delson et al ("Delson"). Claims 4 and 11 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Delson in view of paragraph 5 of the instant specification.

Reconsideration and allowance of all claims is respectfully requested in light of the remarks below.

### **I. § 102(b) – Delson – Claims 1-3, 5-10, and 12-15**

Applicant traverses the Examiner's rejection of claims 1-3, 5-10, and 12-15 under 35 U.S.C. § 102(b) as being anticipated by Delson.

To anticipate a claim under 35 U.S.C. § 102(b), a reference must disclose each and every element of the claimed invention. See M.P.E.P. § 2131.

Because Delson does not disclose "determining an adjusted sensor value based at least in part on the raw sensor value and a compliance between the sensor and the manipulandum" as recited in claim 1, Delson does not anticipate claim 1. The Office Action states that the step quoted above does not recite the modification of adjustment of the raw sensor value. However, two distinct aspects of the claim element indicate otherwise. First, the step is requires "determining" a new value – the adjusted sensor value – based on two other variables: the raw sensor value and the compliance of the manipulandum. Secondly, the new value is an adjusted sensor value. In other words, a sensor value has been adjusted in some manner. Thus, the claim step recites, by its own terms without reference to the specification, determining a new value based upon two existing values.

In contrast, Delson does not disclose that any sensor values are modified. Delson discloses that a drive signal is used to drive a mechanism, a sensor senses the position of the mechanism, and the sensor output is used to make a correction to the drive signal. The sensor value is never modified. Thus, while Delson discloses modifying a drive signal, Delson does not disclose adjusting a sensor value. Therefore, Delson does not

disclose “determining an adjusted sensor value based at least in part on the raw sensor value and a compliance between the sensor and the manipulandum,” and therefore does not anticipate claim 1.

Similar to claim 1, claim 8 recites “determine an adjusted sensor value based at least in part on the raw sensor value and a compliance between the sensor and the manipulandum.” Delson does not anticipate claim 8 for at least the same reasons.

Applicant respectfully requests the Examiner to withdraw the rejection of claims 1 and 8. Because claims 2, 3, 5-7, 9, 10, and 12-15 depend from and further limit claims 1 and 8, claims 2, 3, 5-7, 9, 10, and 12-15 are patentable over Delson for at least the same reasons. Applicant respectfully requests the Examiner withdraw the rejection of claims 2, 3, 5-7, 9, 10, and 12-15.

II. § 103(a) – Delson in view of Paragraph 5 of the Instant Specification – Claims 4 and 11

Applicant respectfully traverses the rejection of claims 4 and 11 under 35 U.S.C. § 103(a) as being unpatentable over Delson in view of the paragraph 5 of the Instant Specification.

To sustain a rejection under 35 U.S.C. § 103(a), the combined references must teach or suggest each and every element of the claimed invention. See M.P.E.P. § 2143.03

Because Delson in view of paragraph 5 of the instant specification does not teach or suggest “determining an adjusted sensor value based at least in part on the raw sensor value and a compliance between the sensor and the manipulandum” as recited in claim 1, from which claim 4 depends, claim 4 is patentable over the combined references. As discussed above, Delson does not teach or suggest “determining an adjusted sensor value based at least in part on the raw sensor value and a compliance between the sensor and the manipulandum” as recited in claim 1. Paragraph 5 of the instant specification does cure this deficiency. Paragraph 5 of the instant specification teaches that compliance may exist in manipulanda. Thus, the combined references do not teach or suggest “determining an adjusted sensor value based at least in part on the raw sensor value and a

compliance between the sensor and the manipulandum.” Claim 4 is therefore patentable over the combined references.

Similar to claim 1, claim 8, from which claim 11 depends, recites “a processor operable to ... determine an adjusted sensor value based at least in part on the raw sensor value and a compliance between the sensor and the manipulandum.” For the same reasons given for claim 4, claim 11 is patentable over the combined references.

Applicant respectfully requests the Examiner withdraw the rejection of claims 4 and 11.

### CONCLUSION

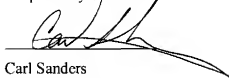
Applicant respectfully asserts that in view of the amendments and remarks above, all pending claims are allowable and Applicant respectfully requests the allowance of all claims.

Should the Examiner have any comments, questions, or suggestions of a nature necessary to expedite the prosecution of the application, or to place the case in condition for allowance, the Examiner is courteously requested to telephone the undersigned at the number listed below.

Date: 10/9/2007

KILPATRICK STOCKTON LLP  
1001 West Fourth Street  
Winston-Salem, NC 27101  
(336) 607-7474 (voice)  
(336) 734-2629 (fax)

Respectfully submitted,

  
Carl Sanders  
Reg. No. 57,203